IN THE

Supreme Court of the United States

October Term, 1970
No. 695

COUNTY OF SANTA BARBARA, *et al.*,

Petitioners,

vs.

ROBERT J. MALLEY, *et al.*

On Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit.

Reply to Answer to Motion to Defer Consideration of Petition for Writ of Certiorari.

In their Answer to Motion to Defer Consideration of Petition for Writ of Certiorari, respondents Humble, *et al.* have attached (pp. 7-20) a copy of their latest memorandum in the District Court. Without discussing the entire memorandum, we deem it appropriate to comment on the statement made by respondents (p. 15) that "the unit agreement has at this date (December 18, 1970) received its *full* administrative process and approval, and at the present time, so far as we are aware, there is no administrative action to enjoin." (emphasis added).

Respondents are mistaken:

1. The Santa Ynez Unit application has not received final administrative approval;

2. There are presently pending before the Department of the Interior two applications for platforms; one, Platform "C," by Union Oil Company; the other, Platform "Henry," by Sun Oil Co.;

3. There are presently pending before the Corps of Engineers four applications by Humble Oil Co. for drilling permits.

Respectfully submitted,

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